

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

2022 MAY 19 PM 1:39

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UNITED STATES OF AMERICA

v.

NORMAN MERRILL II,  
Defendant.

Case No. 2:22-cr-55-1

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

Between in or about 2019 and in or about May of 2022, in the District of Vermont, the defendant, NORMAN MERRILL II, employed and used a minor, to wit: Minor Victim 1, an unaware, pubescent female, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, to wit, a video file with the file name "mmmmmm.avi," using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce.

(18 U.S.C. § 2251(a))

COUNT TWO

Between in or about 2019 and on or about May 11, 2022, in the District of Vermont, the defendant, NORMAN MERRILL II, knowingly and intentionally attempted to employ and use minors, to wit: Minor Victim 1 and Minor Victim 2, both unaware, pubescent females, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce.

(18 U.S.C. § 2251(a) & 2251(e))

COUNT THREE


On or about May 11, 2022, in the District of Vermont, the defendant NORMAN MERRILL II, knowingly possessed at least one matter which contains any visual depiction that was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

(18 U.S.C. § 2252(a)(4)(B))

A TRUE BILL

[REDACTED]

FOR PERSON

  
NIKOLAS P. KEREST (JAO)  
United States Attorney  
Burlington, Vermont  
May 19, 2022